

REMARKS

Claims 1-3, 7-33, and 35-42 are pending in the present application. By this amendment, claims 1-3, 7-33, and 35-36 are amended, and claims 37-42 are added. Further, claims 4-6 and 33 are canceled without prejudice. Applicants respectfully request reconsideration of the present claims in view of the foregoing amendments and the following remarks.

I. Claim Objections

Claims 22-27 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Accordingly, new claims 37-42 have been added. Independent claim 37 includes the recitations of dependent claim 22 rewritten in independent form including at least the features specified in base claim 20 and, thus, is in allowable condition. Dependent claims 38-42 include the recitations of claims 23-27, respectively, and are allowable over the cited references based on their dependency on new claim 37.

II. Claim Rejections Under §102(b) in View of Herrero Garcia

Claims 1-9, 14, 16-21, and 28-36 are rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent No. 5,479,491 to Herrero Garcia et al. (hereinafter "HG"). As discussed above, claims 4-6 are canceled without prejudice, rendering the rejection to these claims moot. Applicants respectfully traverse this rejection.

A. Claims 1-3 and 7-9 are allowable.

As amended, claim 1 recites that a method of forwarding a communication in a telecommunications system from a called address to a forwarding address comprises receiving a non-audio formatted communication directed to the called address; routing the non-audio formatted communication to a central forwarding repository; at the central

forwarding repository, converting the non-audio formatted communication to an audio formatted communication; saving the audio formatted communication at the central forwarding repository; and routing the audio formatted communication from the central forwarding repository to the forwarding address.

HG does not teach, suggest, or describe a method of forwarding a communication in a telecommunications system from a called address to a forwarding address as recited by claim 1. On the contrary, HG describes a method of automatically delivering communications services to a caller including receiving a telephone call from a caller corresponding to a specified application (e.g., 775-INFO); routing the call to a port of a voice mail system (VMS) dedicated to the specified application; providing, at the VMS, a prerecorded voice prompt corresponding to the specified application; and if the call requires connection to a voice conversion system (VCS), then routing the call to the VCS, which permits the caller to access digital database information over the telephone by converting textual database information stored in digital form by a host computer into voice signals for application to the voice line of the caller. HG further describes transferring the call to a contact person if the caller wishes to be transferred to a contact person at the end of the prerecorded message provided by the VMS, and if the transferred call is not answered by the contact person, then providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number. This is not analogous to the method recited by claim 1 because HG fails to teach, suggest, or describe receiving a non-audio formatted communication directed to a specified application; converting the non-audio formatted communication to an audio formatted communication; saving the audio formatted communication at the VMS; and routing the audio formatted communication from the VMS to the specified application. Instead, HG describes receiving a telephone call from a caller and providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number if the contact person does not answer, without suggesting receiving a non-audio formatted communication from the caller, converting the non-audio formatted communication to an audio formatted communication; saving the audio

formatted communication; and providing the audio formatted communication to the contact person.

For at least the reasons given above, Applicants respectfully submit that HG fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 1. Since claims 2-3 and 7-9 depend from claim 1 and recite additional features, Applicants respectfully submit that HG does not anticipate or make obvious Applicants' claimed invention as embodied in claims 2-3 and 7-9 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

B. Claims 14 and 16-19 are allowable.

As amended, claim 14 recites that a method of forwarding an electronic message in a telecommunications system comprises receiving the electronic message directed to a subscriber address; routing the electronic message to a central forwarding repository; at the central forwarding repository, converting the electronic message from a text formatted message to an audio formatted message; saving the audio formatted message at the central forwarding repository; and routing the audio formatted message from the central forwarding repository to the forwarding address.

HG does not teach, suggest, or describe a method of forwarding an electronic message in a telecommunications system as recited by claim 14. In contrast, HG describes a method of automatically delivering communications services to a caller including receiving a telephone call from a caller corresponding to a specified application (e.g., 775-INFO); routing the call to a port of a VMS dedicated to the specified application; providing, at the VMS, a prerecorded voice prompt corresponding to the specified application; and if the call requires connection to a VCS, then routing the call to the VCS, which permits the caller to access digital database information over the telephone by converting textual database information stored in digital form by a host computer into voice signals for application to the voice line of the caller. HG further describes transferring the call to a contact person if the caller wishes to be transferred to a contact person at the end of the prerecorded message provided by the VMS, and if the

transferred call is not answered by the contact person, then providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number. This is not analogous to the method recited by claim 14 because HG fails to teach, suggest, or describe receiving an electronic message directed to a specified application; converting the electronic message from a text formatted message to an audio formatted message; saving the audio formatted message at the VMS; and routing the audio formatted message from the VMS to the specified application. Instead, HG describes receiving a telephone call from a caller and providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number if the contact person does not answer, without suggesting receiving an electronic message from the caller, converting the electronic message from a text formatted message to an audio formatted message; saving the audio formatted message; and providing the audio formatted message to the contact person.

For at least the reasons given above, Applicants respectfully submit that HG fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 14. Since claims 16-19 depend from claim 14 and recite additional features, Applicants respectfully submit that HG does not anticipate or make obvious Applicants' claimed invention as embodied in claims 16-19 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

C. Claims 20-21 are allowable.

As amended, claim 20 recites that a method of forwarding a facsimile transmission in a telecommunications system comprises receiving the facsimile transmission directed to a subscriber address; routing the facsimile transmission to a central forwarding repository; at the central forwarding repository, converting the facsimile transmission from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission at the central forwarding repository; and routing the audio formatted transmission from the central forwarding repository to the forwarding address.

HG does not teach, suggest, or describe a method of forwarding a facsimile transmission in a telecommunications system as recited by claim 20. On the contrary, as discussed above, HG describes a method of automatically delivering communications services to a caller including receiving a telephone call from a caller corresponding to a specified application (e.g., 775-INFO); routing the call to a port of a VMS dedicated to the specified application; providing, at the VMS, a prerecorded voice prompt corresponding to the specified application; and if the call requires connection to a VCS, then routing the call to the VCS, which permits the caller to access digital database information over the telephone by converting textual database information stored in digital form by a host computer into voice signals for application to the voice line of the caller. HG further describes transferring the call to a contact person if the caller wishes to be transferred to a contact person at the end of the prerecorded message provided by the VMS, and if the transferred call is not answered by the contact person, then providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number. This is not analogous to the method recited by claim 20 because HG fails to teach, suggest, or describe receiving a facsimile transmission directed to a specified application; converting the facsimile transmission from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission at the VMS; and routing the audio formatted transmission from the VMS to the specified application. Instead, HG describes receiving a telephone call from a caller and providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number if the contact person does not answer, without suggesting receiving facsimile transmission from the caller, converting the facsimile transmission from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission; and providing the audio formatted transmission to the contact person.

For at least the reasons given above, Applicants respectfully submit that HG fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 20. Since claim 21 depends from claim 20 and recites additional features,

Applicants respectfully submit that HG does not anticipate or make obvious Applicants' claimed invention as embodied in claim 20 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

D. Claim 28-31 are allowable.

As amended, claim 28 recites that a method of forwarding communications in a telecommunications system, comprises routing the telephone calls, facsimile transmissions, and electronic messages received at the specified address to a central forwarding repository; at the central forwarding repository, converting the electronic messages from text formatted messages to audio formatted messages; at the central forwarding repository, converting the facsimile transmissions from image formatted transmissions to audio formatted transmissions; saving the telephone calls, audio formatted facsimile transmissions, and audio formatted electronic messages at the central forwarding repository; and routing the telephone calls, the audio formatted messages, and the audio formatted facsimile transmissions from the central forwarding repository to the forwarding address for receipt by a forwarding party.

HG does not teach, suggest, or describe a method for forwarding communications in a telecommunications system as recited by claim 28. In contrast, as discussed above, HG describes a method of automatically delivering communications services to a caller including receiving a telephone call from a caller corresponding to a specified application (e.g., 775-INFO); routing the call to a port of a VMS dedicated to the specified application; providing, at the VMS, a prerecorded voice prompt corresponding to the specified application; and if the call requires connection to a VCS, then routing the call to the VCS, which permits the caller to access digital database information over the telephone by converting textual database information stored in digital form by a host computer into voice signals for application to the voice line of the caller. HG further describes transferring the call to a contact person if the caller wishes to be transferred to a contact person at the end of the prerecorded message provided by the VMS, and if the transferred call is not answered by the contact person, then providing standard electronic

mailbox type message recording functions to permit the caller to leave his name and telephone number. This is not analogous to the method recited by claim 28 because HG fails to teach, suggest, or describe routing facsimile transmissions and electronic messages directed to a specified application to the VMS; converting the electronic messages from text formatted messages to audio formatted messages, converting the facsimile transmission from image formatted transmissions to audio formatted transmissions; saving the audio formatted facsimile transmissions and the audio formatted electronic messages at the VMS; and routing the audio formatted facsimile transmissions and the audio formatted electronic messages from the VMS to the specified application. Instead, HG describes receiving a telephone call from a caller and providing standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number if the contact person does not answer, without suggesting routing facsimile transmissions and electronic messages from the caller to the VMS, converting the electronic messages from text formatted messages to audio formatted messages, converting the facsimile transmissions from image formatted transmissions to audio formatted transmissions, saving the audio formatted messages and transmissions; and providing the audio formatted message and transmissions to the contact person.

For at least the reasons given above, Applicants respectfully submit that HG fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 28. Since claims 29-31 depend from claim 28 and recite additional features, Applicants respectfully submit that HG does not anticipate or make obvious Applicants' claimed invention as embodied in claims 29-31 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

E. Claims 32-36 are allowable.

As amended, claim 32 recites that a system for forwarding a communication in a telecommunications system from a called address to a forwarding address comprises a switch operative to receive a non-audio formatted communication directed to the called address; to route the non-audio formatted communication to a central forwarding

repository; and the central forwarding repository operative to convert the non-audio formatted communication to an audio formatted communication; to save the audio formatted communication; and to route the audio formatted communication to the forwarding address.

HG does not teach, suggest, or describe a system for forwarding a communication in a telecommunications system from a called address to a forwarding address as recited by claim 32. On the contrary, HG describes a system of automatically delivering communications services to a caller including a PBX operative to receive a telephone call from a caller corresponding to a specified application (e.g., 775-INFO) and route the call to a port of a VMS dedicated to the specified application; the VMS operative to provide a prerecorded voice prompt corresponding to the specified application and if the call requires connection to a VCS, then route the call to the VCS; and the VCS operative to permit the caller to access digital database information over the telephone by converting textual database information stored in digital form by a host computer into voice signals for application to the voice line of the caller. HG further describes that the VMS is operative to transfer the call to a contact person if the caller wishes to be transferred to a contact person, and if the transferred call is not answered by the contact person, then the VMS is operative to provide standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number. This is not analogous to the system recited by claim 32 because HG fails to teach, suggest, or describe that the PBX is operative to receive a non-audio formatted communication directed to a specified application and convert the non-audio formatted communication to an audio formatted communication, and that the VMS is operative to save the audio formatted communication at the VMS and route the audio formatted communication to the specified application. Instead, HG describes that the PBX is operative to receive a telephone call from a caller and that the VMS is operative to provide standard electronic mailbox type message recording functions to permit the caller to leave his name and telephone number if the contact person does not answer, without suggesting that the PBX is operative to receive a non-audio formatted communication from the caller and convert

the non-audio formatted communication to an audio formatted communication, and that the VMS is operative to save the audio formatted communication and provide the audio formatted communication to the contact person.

For at least the reasons given above, Applicants respectfully submit that HG fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 32. Since claims 33-36 depend from claim 32 and recite additional features, Applicants respectfully submit that HG does not anticipate or make obvious Applicants' claimed invention as embodied in claims 33-36 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

III. Claim Rejections Under §102(b) in View of Pepe

Claims 1-9, 14, 16-21, and 28-36 are rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent No. 5,742,905 to Pepe et al. (hereinafter "Pepe"). As discussed above, claims 4-6 are canceled without prejudice, rendering the rejection to these claims moot. Applicants respectfully traverse this rejection.

A. Claims 1-3 and 7-9 are allowable.

As amended, claim 1 recites that a method of forwarding a communication in a telecommunications system from a called address to a forwarding address comprises receiving a non-audio formatted communication directed to the called address; routing the non-audio formatted communication to a central forwarding repository; at the central forwarding repository, converting the non-audio formatted communication to an audio formatted communication; saving the audio formatted communication at the central forwarding repository; and routing the audio formatted communication from the central forwarding repository to the forwarding address.

Pepe does not teach, suggest, or describe a method of forwarding a communication in a telecommunications system from a called address to a forwarding address as recited by claim 1. On the contrary, Pepe describes a method for remotely controlling the receipt and delivery of wireless and wireline voice and text message

including receiving an e-mail message to a Personal Communications Internetworking (PCI) subscriber; checking the subscriber's service profile to determine how to process the e-mail message; if the subscriber's service profile provide an option for voice message notification of e-mail messages, then converting the origination information corresponding to the e-mail message from text to synthesized speech and sending the information to a voice mailbox specified in the subscriber server profile; and if the PCI subscriber is out of radio coverage or not registered, then storing the e-mail message at an external mail storage system. This is not analogous to the method recited by claim 1 because Pepe fails to teach, suggest, or describe converting the e-mail message from text to synthesized speech; saving the synthesized speech e-mail message; and routing the synthesized speech e-mail message to the voice mailbox specified in the subscriber server profile. Instead, Pepe describes converting the origination information corresponding to the e-mail to synthesized speech as an e-mail notification message, routing the synthesized speech notification message to the specified voice mailbox, and storing the e-mail message at an external mail storage system, without suggesting converting the e-mail message to synthesized speech, routing the synthesized speech e-mail message to the specified voice mailbox, and storing the synthesized speech e-mail message.

Pepe also describes receiving a fax to a PCI subscriber and sending a text notification message as the user has selected in the profile. This is not analogous to the method recited by claim 1 because Pepe fails to teach, suggest, or describe converting the fax from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission; and routing the audio formatted transmission as specified in the subscriber server profile. Instead, Pepe describes receiving a fax and sending a *text* notification message based on the subscriber's service profile, without suggesting converting the fax from an image formatted transmission to an audio formatted transmission, routing the audio formatted transmission to as specified by the subscriber's service profile, and storing the audio formatted transmission.

For at least the reasons given above, Applicants respectfully submit that Pepe fails to anticipate or make obvious Applicants' claimed invention as embodied in independent

claim 1. Since claims 2-3 and 7-9 depend from claim 1 and recite additional features, Applicants respectfully submit that Pepe does not anticipate or make obvious Applicants' claimed invention as embodied in claims 2-3 and 7-9 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

B. Claims 14 and 16-19 are allowable.

As amended, claim 14 recites that a method of forwarding an electronic message in a telecommunications system comprises receiving the electronic message directed to a subscriber address; routing the electronic message to a central forwarding repository; at the central forwarding repository, converting the electronic message from a text formatted message to an audio formatted message; saving the audio formatted message at the central forwarding repository; and routing the audio formatted message from the central forwarding repository to the forwarding address.

Pepe does not teach, suggest, or describe a method of forwarding an electronic message in a telecommunications system as recited by claim 14. In contrast, as discussed above, Pepe describes a method for remotely controlling the receipt and delivery of wireless and wireline voice and text message including receiving an e-mail message to a PCI subscriber; checking the subscriber's service profile to determine how to process the e-mail message; if the subscriber's service profile provides an option for voice message notification of e-mail messages, then converting the origination information corresponding to the e-mail message from text to synthesized speech and sending the information to a voice mailbox specified in the subscriber server profile; and if the PCI subscriber is out of radio coverage or not registered, then storing the e-mail message at an external mail storage system. This is not analogous to the method recited by claim 14 because Pepe fails to teach, suggest, or describe converting the e-mail message from text to synthesized speech; saving the synthesized speech e-mail message; and routing the synthesized speech e-mail message to the voice mailbox specified in the subscriber server profile. Instead, Pepe describes converting the origination information corresponding to the e-mail to synthesized speech as an e-mail notification message, routing the

synthesized speech notification message to the specified voice mailbox, and storing the e-mail message at an external mail storage system, without suggesting converting the e-mail message to synthesized speech, routing the synthesized speech e-mail message to the specified voice mailbox, and storing the synthesized speech e-mail message.

For at least the reasons given above, Applicants respectfully submit that Pepe fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 14. Since claims 16-19 depend from claim 14 and recite additional features, Applicants respectfully submit that Pepe does not anticipate or make obvious Applicants' claimed invention as embodied in claims 16-19 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

C. Claims 20-21 are allowable.

As amended, claim 20 recites that a method of forwarding a facsimile transmission in a telecommunications system comprises receiving the facsimile transmission directed to a subscriber address; routing the facsimile transmission to a central forwarding repository; at the central forwarding repository, converting the facsimile transmission from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission at the central forwarding repository; and routing the audio formatted transmission from the central forwarding repository to the forwarding address.

Pepe does not teach, suggest, or describe a method of forwarding a facsimile transmission in a telecommunications system as recited by claim 20. On the contrary, Pepe also describes receiving a fax to a PCI subscriber and sending a text notification message as the subscriber has selected in the profile. This is not analogous to the method recited by claim 20 because Pepe fails to teach, suggest, or describe converting the fax from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission; and routing the audio formatted transmission as specified in the subscriber server profile. Instead, Pepe describes receiving a fax and sending a *text* notification message based on the subscriber's service profile, without suggesting

converting the fax from an image formatted transmission to an audio formatted transmission, routing the audio formatted transmission to as specified by the subscriber's service profile, and storing the audio formatted transmission.

For at least the reasons given above, Applicants respectfully submit that Pepe fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 20. Since claim 21 depends from claim 20 and recites additional features, Applicants respectfully submit that Pepe does not anticipate or make obvious Applicants' claimed invention as embodied in claim 20 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

D. Claim 28-31 are allowable.

As amended, claim 28 recites that a method of forwarding communications in a telecommunications system, comprises routing the telephone calls, facsimile transmissions, and electronic messages received at the specified address to a central forwarding repository; at the central forwarding repository, converting the electronic messages from text formatted messages to audio formatted messages; at the central forwarding repository, converting the facsimile transmissions from image formatted transmissions to audio formatted transmissions; saving the telephone calls, audio formatted facsimile transmissions, and audio formatted electronic messages at the central forwarding repository; and routing the telephone calls, the audio formatted messages, and the audio formatted facsimile transmissions from the central forwarding repository to the forwarding address for receipt by a forwarding party.

Pepe does not teach, suggest, or describe a method for forwarding communications in a telecommunications system as recited by claim 28. On the contrary, Pepe describes a method for remotely controlling the receipt and delivery of wireless and wireline voice and text message including receiving an e-mail message to a Personal Communications Internetworking (PCI) subscriber; checking the subscriber's service profile to determine how to process the e-mail message; if the subscriber's service profile provide an option for voice message notification of e-mail messages, then converting the

origination information corresponding to the e-mail message from text to synthesized speech and sending the information to a voice mailbox specified in the subscriber server profile; and if the PCI subscriber is out of radio coverage or not registered, then storing the e-mail message at an external mail storage system. This is not analogous to the method recited by claim 28 because Pepe fails to teach, suggest, or describe converting the e-mail message from text to synthesized speech; saving the synthesized speech e-mail message; and routing the synthesized speech e-mail message to the voice mailbox specified in the subscriber server profile. Instead, Pepe describes converting the origination information corresponding to the e-mail to synthesized speech as an e-mail notification message, routing the synthesized speech notification message to the specified voice mailbox, and storing the e-mail message at an external mail storage system, without suggesting converting the e-mail message to synthesized speech, routing the synthesized speech e-mail message to the specified voice mailbox, and storing the synthesized speech e-mail message.

Pepe also describes receiving a fax to a PCI subscriber and sending a text notification message as the user has selected in the profile. This is not analogous to the method recited by claim 28 because Pepe fails to teach, suggest, or describe converting the fax from an image formatted transmission to an audio formatted transmission; saving the audio formatted transmission; and routing the audio formatted transmission as specified in the subscriber server profile. Instead, Pepe describes receiving a fax and sending a *text* notification message based on the subscriber's service profile, without suggesting converting the fax from an image formatted transmission to an audio formatted transmission, routing the audio formatted transmission to as specified by the subscriber's service profile, and storing the audio formatted transmission.

For at least the reasons given above, Applicants respectfully submit that Pepe fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 28. Since claims 29-31 depend from claim 28 and recite additional features, Applicants respectfully submit that Pepe does not anticipate or make obvious Applicants'

claimed invention as embodied in claims 29-31 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

E. Claims 32-36 are allowable.

As amended, claim 32 recites that a system for forwarding a communication in a telecommunications system from a called address to a forwarding address comprises a switch operative to receive a non-audio formatted communication directed to the called address; to route the non-audio formatted communication to a central forwarding repository; and the central forwarding repository operative to convert the non-audio formatted communication to an audio formatted communication; to save the audio formatted communication; and to route the audio formatted communication to the forwarding address.

Pepe does not teach, suggest, or describe a system for forwarding a communication in a telecommunications system from a called address to a forwarding address as recited by claim 32. In contrast, Pepe describes a system for remotely controlling the receipt and delivery of wireless and wireline voice and text message including a PCI server operative to receive an e-mail message to a PCI subscriber; check the subscriber's service profile to determine how to process the e-mail message; if the subscriber's service profile provide an option for voice message notification of e-mail messages, then convert the origination information corresponding to the e-mail message from text to synthesized speech and sending the information to a voice mailbox specified in the subscriber server profile; and if the PCI subscriber is out of radio coverage or not registered, then store the e-mail message at an external mail storage system. This is not analogous to the system recited by claim 32 because Pepe fails to teach, suggest, or describe that the PCI server is operative to convert the e-mail message from text to synthesized speech; save the synthesized speech e-mail message; and route the synthesized speech e-mail message to the voice mailbox specified in the subscriber server profile. Instead, Pepe describes that the PCI server is operative to convert the origination information corresponding to the e-mail to synthesized speech as an e-mail notification

message, route the synthesized speech notification message to the specified voice mailbox, and store the e-mail message at an external mail storage system, without suggesting that the PCI server is operative to convert the e-mail message to synthesized speech, route the synthesized speech e-mail message to the specified voice mailbox, and store the synthesized speech e-mail message.

Pepe also describes that the PCI server is operative to receive a fax to a PCI subscriber and send a text notification message as the user has selected in the profile. This is not analogous to the system recited by claim 32 because Pepe fails to teach, suggest, or describe that the PCI server is operative to convert the fax from an image formatted transmission to an audio formatted transmission; save the audio formatted transmission; and route the audio formatted transmission as specified in the subscriber server profile. Instead, Pepe describes that the PCI server is operative to receive a fax and send a *text* notification message based on the subscriber's service profile, without suggesting that the PCI server is operative to convert the fax from an image formatted transmission to an audio formatted transmission, route the audio formatted transmission to as specified by the subscriber's service profile, and store the audio formatted transmission.

For at least the reasons given above, Applicants respectfully submit that Pepe fails to anticipate or make obvious Applicants' claimed invention as embodied in independent claim 32. Since claims 33-36 depend from claim 32 and recite additional features, Applicants respectfully submit that Pepe does not anticipate or make obvious Applicants' claimed invention as embodied in claims 33-36 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

IV. Claim Rejections Under 35 U.S.C. §103(a) in View of Herrero Garcia

Claims 10-13 and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over HG. This rejection is respectfully traversed.

For at least the reasons given above, claim 1 is allowable over HG. Since claims 10-13 depend from claim 1 and recite additional features, Applicants respectfully submit

that HG does not make obvious Applicants' claimed invention as embodied in claims 10-13 for at least the reasons given above. Accordingly, withdrawal of this rejection is respectfully requested.

For at least the reasons given above, claim 14 is allowable over HG. Since claim 15 depends from claim 14 and recites additional features, Applicants respectfully submit that HG does not make obvious Applicants' claimed invention as embodied in claim 15 for at least the reasons given above. Accordingly, withdrawal of this rejection is respectfully requested.

v. Claim Rejections Under 35 U.S.C. §103(a) in View of Pepe

Claims 10-13 and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pepe. This rejection is respectfully traversed.

For at least the reasons given above, claim 1 is allowable over Pepe. Since claims 10-13 depend from claim 1 and recite additional features, Applicants respectfully submit that Pepe does not make obvious Applicants' claimed invention as embodied in claims 10-13 for at least the reasons given above. Accordingly, withdrawal of this rejection is respectfully requested.

For at least the reasons given above, claim 14 is allowable over Pepe. Since claim 15 depends from claim 14 and recites additional features, Applicants respectfully submit that Pepe does not make obvious Applicants' claimed invention as embodied in claim 15 for at least the reasons given above. Accordingly, withdrawal of this rejection is respectfully requested.

VI. New Claims 37-42

New claims 37-42 are directed to further embodiments of Applicants' claimed invention. Support for new claims 37-42 may be found at page 14, line 6 through page 15, line 12 of the specification.

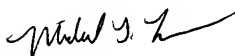
As discussed above, new independent claim 37 includes the recitations of dependent claim 22 rewritten in independent form including at least the features specified

in base claim 20 and, thus, is in allowable condition. New dependent claims 38-42 include the recitations of claims 23-27, respectively, and are allowable over the cited references based on their dependency on new claim 37.

CONCLUSION

For at least these reasons, Applicant asserts that the pending claims 1-3, 7-33, and 35-42 are in condition for allowance. The Applicant further asserts that this response addresses each and every point of the Office Action, and respectfully requests that the Examiner pass this application with claims 1-3, 7-33, and 35-42 to allowance. Should the Examiner have any questions, please contact Applicants' attorney at 404.954.5042.

Respectfully submitted,
MERCHANT & GOULD, LLC



Michael T. Lukon
Reg. No. 48,164

Merchant & Gould
P.O. Box 2903
Minneapolis, Minnesota 55402-0903
Telephone: 404.954.5100

